

MATTHEW ISHAM,) CIVIL NO.: CV 04 00559 HG-BMK
individually and as Guardian Ad)
Litem for HAYDEN ISHAM, a)
minor; ROXANNE BEST)
ISHAM,)
)
Plaintiffs,)
)
vs.)
)
BLUE DOLPHIN CHARTERS,)
LTD. and BLUE DOLPHIN)
DIVING, LTD., CAPTAIN)
ANDY'S SAILING, INC.,)
DOES 1 - 50,)
)
Defendants.)
)

DENNIS CLAYPOOL,) CIVIL NO.: CV 04 00570 HG-BMK
individually and as Guardian ad)
Litem for KRISTEN)
CLAYPOOL, a minor, SHERYL)
CLAYPOOL, SCOTT)
CLAYPOOL, AND KRISTEN)
CLAYPOOL,)
)
Plaintiffs,)
)
vs.)
)
CAPTAIN ANDY'S SAILING,)
INC., BLUE DOLPHIN)
CHARTERS, LTD. And BLUE)
DOLPHIN DIVING, LTD.,)
)
Defendants.)
)

DECLARATION OF STEVEN McGUIRE

I, Steven M. McGuire, declare as follows:

1. I am an associate at Lesser & Associates, PLC, counsel of record for Plaintiff/Limitation Claimant Matthew Isham. I am admitted to practice pro hac vice in this matter before this court. I make this declaration under penalty of perjury.

2. A true and correct copy of Bond Under Rule F of the Supplemental Rules for Certain Admiralty and Maritime Claims of Blue Dolphin Charters, Ltd. and Terry Donnelly is attached hereto as Exhibit "A."

3. A true and correct copy of this courts Judgment in a Civil Case is attached hereto as Exhibit "B."

4. A true and correct copy of the Amended Offer to Allow Money Judgment to be Taken Against Limitation Plaintiff/Defendants Blue Dolphin Charters, Ltd. and Terry Donnelly in Favor of Matthew Isham, Individually Under Fed. Rule Civ. P. 68 is attached hereto as Exhibit "C."

Dated: Redondo Beach, California, March 3rd, 2006.

/s/ Steven M. McGuire
STEVEN M. McGUIRE